

1 ORRICK, HERRINGTON & SUTCLIFFE LLP  
KAREN G. JOHNSON-MCKEYAN (SBN 121570)  
2 kjohnson-mckewan@orrick.com  
ANNETTE L. HURST (SBN 148738)  
3 ahurst@orrick.com  
GABRIEL M. RAMSEY (SBN 209218)  
4 gramsey@orrick.com  
405 Howard Street, San Francisco, CA 94105  
5 Tel: 1.415.773.5700 / Fax: 1.415.773.5759  
PETER A. BICKS (*pro hac vice*)  
6 pbicks@orrick.com  
LISA T. SIMPSON (*pro hac vice*)  
7 lsimpson@orrick.com  
51 West 52<sup>nd</sup> Street, New York, NY 10019  
8 Tel: 1.212.506.5000 / Fax: 1.212.506.5151

9 BOIES, SCHILLER & FLEXNER LLP  
DAVID BOIES (*pro hac vice*)  
10 dboies@bsfllp.com  
333 Main Street, Armonk, NY 10504  
11 Tel: 1.914.749.8200 / Fax: 1.914.749.8300  
STEVEN C. HOLTZMAN (SBN 144177)  
12 sholtzman@bsfllp.com  
1999 Harrison St., Ste. 900, Oakland, CA 94612  
13 Tel: 1.510.874.1000 / Fax: 1.510.874.1460

ORACLE CORPORATION  
14 DORIAN DALEY (SBN 129049)  
dorian.daley@oracle.com  
15 DEBORAH K. MILLER (SBN 95527)  
deborah.miller@oracle.com  
16 MATTHEW M. SARBORARIA (SBN 211600)  
matthew.sarboraria@oracle.com  
17 RUCHIKA AGRAWAL (SBN 246058)  
ruchika.agrawal@oracle.com  
18 500 Oracle Parkway,  
Redwood City, CA 94065  
19 Tel: 650.506.5200 / Fax: 650.506.7117

20 *Attorneys for Plaintiff*  
ORACLE AMERICA, INC.

21 UNITED STATES DISTRICT COURT  
22 NORTHERN DISTRICT OF CALIFORNIA  
23 SAN FRANCISCO DIVISION

24 ORACLE AMERICA, INC.  
25 Plaintiff,  
26 v.  
27 GOOGLE INC.  
28 Defendant.

Case No. CV 10-03561 WHA  
**DECLARATION OF MATTHEW L.  
BUSH IN SUPPORT OF ORACLE'S  
ADMINISTRATIVE MOTION TO FILE  
UNDER SEAL**

Dept.: Courtroom 8, 19th Floor  
Judge: Honorable William H. Alsup

I, Matthew L. Bush, declare and state as follows:

1. I am a member of the bar of the State of New York, admitted to practice before this Court, and an associate with the law firm of Orrick, Herrington & Sutcliffe LLP (“Orrick”), attorneys of record for plaintiff Oracle America, Inc. (“Oracle”). I am familiar with the events, pleadings and discovery in this action and, if called upon as a witness, I could and would testify competently to the matters stated herein of my own personal knowledge.

2. I submit this declaration in support of Oracle’s Administrative Motion to File Under Seal.

3. The following portions of Exhibit 4 to the Declaration of Gabriel M. Ramsey in Support of Oracle’s Opposition to Google’s Motion to Strike Portions of Oracle’s Expert Reports (“Ramsey Declaration”) summarize, quote from, or reproduce materials that have been designated by Google Inc. as “CONFIDENTIAL” or “HIGHLY CONFIDENTIAL – ATTORNEY’S EYES ONLY” pursuant to the Protective Order:

|                    |                  |                          |
|--------------------|------------------|--------------------------|
| Page 4             | Page 26 ¶ 89     | Page 49 ¶ 167            |
| Page 11 ¶ 27       | Page 27 ¶ 90     | Page 49 ¶ 168 n. 85      |
| Page 11 ¶ 28 n. 13 | Page 27 ¶ 91     | Page 51 ¶ 173            |
| Page 12 ¶ 34       | Page 27 ¶ 92     | Page 52-53 ¶ 180         |
| Page 18 ¶ 56       | Pages 28-29 ¶ 93 | Page 53 ¶ 182            |
| Page 18 ¶ 59       | Page 35 ¶ 111    | Page 56 ¶ 193            |
| Page 18 ¶ 60       | Page 35 ¶ 112    | Page 56 ¶ 197            |
| Page 22 ¶ 73       | Page 36 ¶ 112    | Page 57 ¶ 198            |
| Page 24-25 ¶ 79    | Page 36 ¶ 114    | Pages 57-59 ¶¶ 202-207   |
| Page 25 ¶ 81       | Page 38 ¶ 117    | Page 60 ¶ 209 n. 102     |
| Pages 25-26 ¶ 85   | Page 38 ¶ 118    | Page 61 ¶ 211 n. 105     |
| Page 26 ¶ 87       | Page 38-39 ¶ 121 | Page 64                  |
| Page 26 ¶ 88       | Page 48 ¶ 165    | Appendices H, K, N and O |

4. Exhibits 13 and 14 to the Ramsey Declaration summarize, quote from, or

1 reproduce materials that have been designated by Google Inc. as “CONFIDENTIAL” or  
2 “HIGHLY CONFIDENTIAL – ATTORNEY’S EYES ONLY” pursuant to the Protective Order.

3  
4  
5 I declare under penalty of perjury under the laws of the United States that the foregoing is  
6 true and correct.

7 Executed this 1st day of February, 2016, at New York, NY.

8  
9 /s/ Matthew L. Bush

10 Matthew L. Bush  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28